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Attorney for RODRIGUEZ

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

RODRIGUEZ ET AL.,

Defendants.

Case No.: 2:22-mj-00864-NJK

**STIPULATION TO CONTINUE  
PRELIMINARY EXAMINATION DATE**

**(SIXTH REQUEST)**

IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson, United States Attorney, District of Nevada, and Edward G. Veronda Assistant United States Attorney, counsel for the United States of America, and Rene L. Valladares, Federal Public Defender, and Joanne L. Diamond, Assistant Federal Public Defender, counsel for Josue Abraham Reynosa Ochoa, and Gabriel L. Grasso, Esq, counsel for Louis Daniel Rodriguez, that the Preliminary Examination hearing currently scheduled for August 31, 2022 at 4:00 p.m., be vacated and set to a date and time convenient to this court but no sooner than sixty (60) days.

The Stipulation is entered into for the following reasons:

1. The parties require additional time to discuss the potential for Pre-Indictment negotiations.

2. Counsel for Rodriguez is new to the case and has only recently received portions of the pre-indictment discovery.

3. Mr. Rodriguez and Mr. Reynosa-Ochoa are out of custody and agree to the continuance.

4. The parties agree to the continuance.

5. The additional time requested herein is not sought for purposes of delay, but merely to allow counsel for defendant sufficient time within which to be able to effectively and complete investigation of the discovery materials provided.

6. Denial of this request for continuance would result in a miscarriage of justice.

7. The additional time requested by this Stipulation is excludable in computing the time within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18, United States Code, Section 3161(h)(7)(A), considering the factors under Title 18, United States Code, Section 3161(h)(7)(B)(i), (iv).

This is the sixth request for a continuance of the preliminary hearing date in this case.

DATED this 25<sup>th</sup> day of August 2023.

GABRIEL L. GRASSO, P.C.

JASON M. FRIERSON  
United States Attorney

By /s/ Gabriel L. Grasso  
GABRIEL L. GRASSO, ESQ.  
Counsel for Louis Daniel Rodriguez

By /s/ Edward G. Veronda  
EDWARD G. VERDONA  
Assistant United States Attorney

RENE L. VALLADARES  
Federal Public Defender

By /s/ Joanne L. Diamond  
JOANNE L. DIAMOND  
Assistant Federal Public Defender

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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA, )  
)  
Plaintiff, )  
)  
vs. )  
)  
RODRIGUEZ ET AL., )  
)  
Defendants. )  
\_\_\_\_\_)

Case No.: 2:20-mj-00864-NJK

**ORDER**

Based on the Stipulation of counsel, and good cause appearing  
IT IS THEREFORE ORDERED that the Preliminary Examination hearing currently  
scheduled for August 31<sup>st</sup>, 2023, at 4:00 p.m., be vacated and continued to  
Tuesday, October 31, 2023, at the hour of 4:00 p.m., in Courtroom 3C.

DATED this 28th day of August, 2023.

  
UNITED STATES MAGISTRATE JUDGE